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ATTORNEYS FOR PLAINTIFF

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DONNA GARCIA,  Plaintiff,  vs.  RESURGENT CAPITAL L.P., LVNV FUNDING, LLC, THE BRACHFELD LAW GROUP, P.C.,  Defendants.	CIV. NO. 11-1253 EMC  <b>MOTION FOR ADMINISTRATIVE RELIEF REGARDING FILING DOCUMENTS UNDER SEAL and [Proposed] ORDER</b>  HON. EDWARD CHEN
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Brachfeld Law Group, P.C., LVNV Funding, LLC and Resurgent Capital Services, LLP, have filed Motions for Summary Judgment (Docket #79 and 80) to be heard on March 23, 2012. Plaintiff respectfully requests the Court enter an order, consistent with the previous N.D. Cal. L.R., permitting plaintiff to file documents that accompany plaintiff's opposition to defendants' motion for summary judgment under seal.

Plaintiff's request to file documents under seal is narrowly tailored to seek

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and [Proposed] ORDER**

1 sealing only of sealable material, and conforms with Civil L.R. 79-5(b) and/or (c). Plaintiff  
2 respectfully requests the Court seal selected portions of Plaintiff's Opposition to Defendants'  
3 Motion for Summary Judgment.

4 **More specifically, Plaintiff respectfully requests the Court seal all text from lines**  
5 **eighteen (18) through twenty eight (28) on page twenty two (22) and Line One (1) on page**  
6 **twenty three (23).**

7 The basis for this motion is the subject text refers to and contains excerpts from a  
8 document titled ""Network Collection Attorney Agreement", an attorney client agreement  
9 between defendants Brachfeld and LVNV. The referred text contains information pertaining to  
10 defendant Brachfeld's confidential internal collection policies, attached to Mr. Wilcox's  
11 declaration as Exhibit 9. Therefore, plaintiff also requests Exhibit 9 to Wilcox's declaration be  
12 sealed.

13  
14 Defendants have alleged these documents are confidential, and privileged, and  
15 protectable as a trade secret or otherwise entitled to protection under the law and, as a result,  
16 such excerpts are justified being closed to public view. Thus, Plaintiff has filed this herein  
17 motion.

18  
19 Respectfully,

20 /S/

21 PAUL H. NATHAN  
22 Counsel for Plaintiff

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24  
25  
**MOTION FOR ADMINISTRATIVE RELIEF TO FILE DOCUMENTS UNDER SEAL  
and [Proposed] ORDER**

[Proposed] ORDER

The Motion for Administrative Relief is hereby GRANTED.

**IT IS SO ORDERED.**

Date:

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Hon. Edward Chen  
U.S. District Court Judge

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and [Proposed] ORDER**